

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

KATHERINE L. WAWRZYNIAK (CABN 252751)
Chief, Criminal Division

CLAUDIA QUIROZ (CABN 254419)
KATHERINE LLOYD-LOVETT (CABN 276256)
Assistant United States Attorneys
C. ALDEN PELKER (MD)
Trial Attorney
Computer Crime & Intellectual Property Section
United States Department of Justice

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7428
FAX: (415) 436-7234
claudia.quiroz@usdoj.gov
katherine.lloyd-lovett@usdoj.gov
catherine.pelker@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) NO. CR 16-00227 SI
Plaintiff,) [FILED: January 17, 2017]
v.)
BTC-E, A/K/A CANTON BUSINESS)
CORPORATION,)
and)
ALEXANDER VINNIK,)
Defendants.)

NOTICE OF RELATED CASES
CR 16-00227 SJ; CR 22-00255 VC

v. 7/10/2018

1 UNITED STATES OF AMERICA,) NO. CR 22-00255-VC
2 Plaintiff,) [FILED: July 12, 2022]
3 v.)
4 ALEXEI VIKTOROVICH BILUCHENKO,) NOTICE OF RELATED CASE IN A CRIMINAL
5 a/k/a "Alexsey Viktorovich Bilyuchenko,") ACTION
6 a/k/a "Алексей Викторович Билюченко"))
7 Defendant.)

8 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court
 9 that the two above-captioned criminal cases are related. Both cases involve the same facts and
 10 circumstances, and concern in large part similar and collaborative conduct.

11 **A. *United States v. Alexander Vinnik, CR 16-00227 SI***

12 On January 17, 2017, a federal grand jury in this district returned a superseding indictment
 13 against Defendant Alexander Vinnik. The superseding indictment alleged, among other things, that
 14 Vinnik and others directed and supervised the operations and finances of BTC-e, one of the world's
 15 largest digital currency exchanges, which operated between around 2011 until it was shut down by law
 16 enforcement in or around July 2017. Superseding Indictment ¶ 1. The superseding indictment further
 17 alleges that, through Vinnik's efforts, BTC-e emerged as one of the principal means by which cyber
 18 criminals around the world laundered the proceeds of their criminal activity. *Id.* ¶ 2.

19 The superseding indictment charged BTC-e and Vinnik with one count of operation of an
 20 unlicensed money service business, in violation of 18 U.S.C. § 1960, and one count of conspiracy to
 21 commit money laundering, in violation of 18 U.S.C. § 1956(h). In addition, the superseding indictment
 22 charged Vinnik with seventeen counts of money laundering, in violation of 18 U.S.C. § 1956(a)(1), and
 23 two counts of engaging in unlawful monetary transactions, in violation of 18 U.S.C. § 1957.

24 **B. *United States v. Alexei Viktorovich Biluchenko, CR 22-00255 VC***

25 On July 12, 2022, a federal grand jury in this district returned a two-count indictment against
 26 Defendant Biluchenko, similarly charging him with operation of an unlicensed money service business,
 27 in violation of 18 U.S.C. § 1960, and conspiracy to commit money laundering, in violation of 18 U.S.C.
 28 NOTICE OF RELATED CASES
 CR 16-00227 SI; CR 22-00255 VC

1 § 1956(h). The indictment alleges that Biluchenko worked with Alexander Vinnik and others to operate
 2 BTC-e from 2011 until it was shut down by law enforcement in July 2017. Biluchenko Indictment ¶ 2.

3 **C. NOTICE OF RELATED CASES**

4 Local Rule 8-1(a) provides that a new case should be related to an existing case that “is or was
 5 pending in this District.” Crim. L.R. 8-1(a). This shall be done by filing a “Notice of Related Case in a
 6 Criminal Action” with the Judge assigned to the earliest filed action and serving all known parties with a
 7 copy of the notice. *Id.* Two cases are related for purposes of this rule if they (1) “concern one or more
 8 of the same defendants and the same alleged events, occurrences, transactions or property” or (2)
 9 “appear likely to entail substantial duplication of labor if heard by different Judges or might create
 10 conflicts and unnecessary expenses if conducted before different Judges.” Crim. L.R. 8.1(b).

11 Based upon these facts, the cases are related within the meaning of Local Rule 8-1(b)(1) because
 12 they involve the same alleged events, occurrences, transactions, and property. Furthermore, the cases
 13 are related within the meaning of Local Rule 8-1(b)(2) because, if heard by separate judges, the actions
 14 likely would involve substantial duplication of labor by the two judges.

15 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment
 16 of these cases to a single judge is likely to conserve judicial resources and promote an efficient
 17 determination of each action.

18 DATED: June 12, 2023

Respectfully submitted,

19 ISMAIL J. RAMSEY
 20 United States Attorney

21 /s/

22 CLAUDIA QUIROZ
 23 KATHERINE LLOYD-LOVETT
 24 Assistant United States Attorneys
 25 C. ALDEN PELKER
 26 Trial Attorney, CCIPS
 27 Assistant United States Attorney